

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

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| In re:                     | : Chapter 9             |
|                            | :                       |
| CITY OF DETROIT, MICHIGAN, | : Case No.: 13-53846    |
|                            | :                       |
| Debtor.                    | : Hon. Steven W. Rhodes |
|                            | :                       |
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NOTICE OF APPEARANCE AND REQUEST  
FOR NOTICES AND SERVICE OF PAPERS

PLEASE TAKE NOTICE that International Union, UAW (“UAW”), through its undersigned counsel, submits this notice of appearance and, pursuant to Federal Rules of Bankruptcy Procedure Rules 2002 and 9010(b) and 11 U.S.C. §§ 901(a) and 1109(b), requests that all notices given or required to be given and all papers served in this chapter 9 case be delivered to and served upon the counsel as follows:

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PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers is without prejudice to the UAW’s rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the Court, the Court’s jurisdiction over the City of Detroit, or the City of Detroit’s eligibility to commence and/or maintain proceedings under Title 11 of the United States Code, and shall not be deemed

or construed to submit the UAW to the jurisdiction of the Court. This Notice is not intended, nor shall it be deemed, to be a consent to or waiver of the right to challenge the jurisdiction of this Court to adjudicate any matter, including, without limitation, whether these proceedings are properly authorized under Michigan or federal law, and any non-core matter; nor is it a consent to or waiver of any right to a jury trial which might be available on any issue during the course of these proceedings, all of which rights are expressly reserved. All rights, remedies, and claims are hereby expressly reserved. Neither this Notice nor any subsequent appearance, pleading, claim or suit shall waive (i) the right of the UAW to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the right of the UAW to a trial by jury in any proceeding so triable in this or any other case, controversy, or proceeding related to these cases, or (iii) the right to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

Dated: August 1, 2013  
New York, New York

Cohen, Weiss and Simon LLP

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